

EPSTEIN
BECKER
GREEN

Attorneys at Law

Shira M. Blank
t 212.351.4694
f 212.878.8600
SBlank@ebglaw.com

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#:
DATE FILED: 4/21/2025

April 18, 2025

VIA ECF

Hon. Andrew L. Carter Jr.
United States District Court
Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

**Re: Dedra De La Rosa v. Fresh, Inc. d/b/a Fresh Cosmetics and
872 Broadway Equities Associates, LLC
Case No.: 24-cv-09517 (ALC)**

Dear Judge Carter:

This Firm represents Defendant Fresh, Inc. (“Fresh”) in the above referenced matter. We write, jointly with counsel for Plaintiff (collectively, the “Parties”), and pursuant to Your Honor’s Individual Practices to respectfully request that the Court stay all pending deadlines, including Fresh’s deadline to respond to the Complaint, which is currently due April 22, 2025, for sixty days to allow the Parties to mediate and attempt to resolve this matter.

The Parties have engaged in preliminary settlement discussions and have agreed to Marc Isserles, Esq. a qualified mediator affiliated with JAMS to serve as the mediator for this matter. The Parties and are scheduled to mediate with Mr. Isserles on June 11, 2025 – the first date that the Parties were available.

As the Parties are hopeful that mediation will assist them in reaching a resolution.

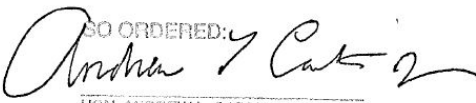
Parties’ make this first request for a stay. The Parties respectfully submit that the requested stay is in the interest of judicial economy because it will allow the Court and the Parties to avoid having to expend substantial resources on litigation while the Parties attempt to resolve this matter. We will update the Court as soon as the mediation is completed and to the extent that the Parties reach an agreement.

We appreciate Your Honor’s consideration of this request and attention to this matter.

Respectfully Submi

/s/ Shira M. Blank

Shira M. Blank

SO ORDERED:

HON. ANDREW L. CARTER, JR.
UNITED STATES DISTRICT JUDGE

April 21, 2025
New York, NY